

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,
Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CARLETON
NELSON; CASEY KIRSCHNER;
ALLCORE DEVELOPMENT LLC;
FINBRIT HOLDINGS LLC; CHESHIRE
VENTURES LLC; 2010 IRREVOCABLE
TRUST; SIGMA REGENERATIVE
SOLUTIONS LLC; CTBSRM, INC.;
RODNEY ATHERTON; DEMETRIUS VON
LACEY; RENRETS LLC,
Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,
Intervening Interpleader
Plaintiff, Intervening
Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;
BW HOLDINGS, LLC,
Interpleader Defendants,
and
AMAZON.COM, INC., and AMAZON
DATA SERVICES, INC.,
Interpleader Defendants,
Interpleader Counter-Plaintiffs.

JOINT MOTION FOR AN ORDER EXTENDING CERTAIN CASE DEADLINES

Amazon.com, Inc., Amazon Data Services, Inc., Rodney Atherton, Carleton Nelson, Casey Kirschner, Brian Watson, WDC Holdings LLC, Sterling NCP FF, LLC, Manassas NCP FF, LLC, NSIPI Administrative Manager, Cheshire Ventures, and Renrets LLC (collectively, the “Parties”) respectfully move this Court for an order extending the deadlines in this case for expert disclosures, summary judgment motions and briefs, and pretrial disclosures. The Parties also respectfully submit that the October 20, 2022 pretrial hearing should remain on calendar in order to set a trial date.

This motion is necessitated by the fact that Rodney Atherton’s wife is seriously ill. To accommodate Mr. Atherton, the Parties have agreed to postpone his deposition until October 28. The Parties also agree that Mr. Atherton’s testimony is essential to summary judgment, the expert analysis, and the formulation of trial strategy, and that the deadlines for all related submissions should, therefore, be postponed as well to ensure that the record is sufficiently developed when they are prepared. The Parties request that the due date for pretrial disclosures (witness and exhibit lists, deposition designations and statement of stipulated facts) be moved closer to the trial date, while keeping the October 20th hearing in place so that a trial date can be set.

Accordingly, the Parties respectfully and jointly request that the Court enter an Order setting the remaining case deadlines as follows and permitting the Parties to file pretrial disclosures sixty (60) days before trial:

Pre-trial hearing to set trial date	October 20, 2022
Expert disclosures	November 11, 2022
Rebuttal expert reports	December 2, 2022
Expert depositions complete	December 16, 2022
Summary judgment motions	January 11, 2023
Summary judgment responses	January 25, 2023
Summary judgment replies	February 1, 2023
Summary judgment hearing	February 8, 2023
Pretrial hearing disclosures due	60 days before trial

A proposed order is attached.

Dated: September 21, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

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